

The Advocate of South Carolina Small Business

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August 9, 2017

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

Re: Petition of South Carolina Electric & Gas Company for Prudency Determination Regarding Abandonment, Amendments to the Construction Schedule, Capital Cost Schedule and Other Terms of the BLRA Orders for the V.C. Summer Units 2 and 3 and Related Matters, along with a Motion for Expedited Hearing **Docket No. 2017-244-E**

Application of South Carolina Electric & Gas Company for Approval to Revise Rates under the Base Load Review Act (Letter of Intent) **Docket No. 2017-246-E**

Dear Ms. Boyd:

I am writing both as an individual who has petitioned to intervene in the above referenced matter and as the President and CEO of the South Carolina Small Business Chamber of Commerce. I write in support of the Office of Regulatory Staff's Motion to Dismiss Docket No. 2017-244-E and a Motion to Administratively Close Docket, or in the Alternate, Motion to Dismiss Docket No. 2017-246-E.

I concur with the Office of Regulatory Staff's compelling argument that SCE&G filed its motion to abandon under the incorrect section of the Base Load Review Act.

It is my understanding that the section used by SCE&G is to be used by the Public Service Commission to approve new construction costs or a revised construction schedule for the purpose of moving the construction project to completion. Clearly a

motion to abandon construction is not for the approval of new construction costs to complete the project but is instead intended to be used for approval of construction costs already incurred and the assignment of those costs as the responsibility of the ratepayers.

In addition, by use of the incorrect section of the Base Load Review Act for its motions, SCE&G intends to eliminate intervenors' ability to challenge the return on equity by claiming that the Public Service Commission must use the last return on equity approved (10.25%). Given the controversy surrounding SCE&G's performance on this project, the Public Service Commission must have unilateral ability to approve a far lower return on equity.

Thank you for your consideration of my request.

Sincerely,

Frank Knapp Jr. President & CEO